

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

MARY ACREE,

Plaintiff,

vs.

**UNITED INSURANCE COMPANY
OF AMERICA,**

Defendants.

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CASE NO. 1:05 CV 956

REPORT OF PARTIES' PLANNING MEETING

1. Appearances. In accordance with Fed.R.Civ.P.26(f), a meeting was held by telephone between the following:

M. Adam Jones, Counsel for the Plaintiff
Kevin E. Clark, Counsel for the Defendant

2. Pre-discovery Disclosures. The parties will exchange by January 17, 2006 the information required by Fed.R.Civ.P.26(a)(1).

3. Discovery Plan. The parties jointly propose the following discovery plan:

a. Discovery will be needed on the following subjects:

- 1) All information pertaining to plaintiff's claims and damages.
- 2) All information pertaining to defendant's defenses.

b. All discovery commenced in time to be completed by August 21, 2006.

c. Maximum of 30 interrogatories from each party to any other party, with answers due within 30 days of service.

d. Maximum of 20 requests for admissions from each party to any other party, with responses due within 30 days of service.

- e. Maximum of 30 requests for production from each party to any other party, with responses due within 30 days of service.
- f. Maximum of 10 depositions by plaintiffs and 10 depositions by defendant.
- g. The depositions of the plaintiff and the defendant's designated corporate representative(s) shall be limited to a maximum of 7 hours unless extended by agreement of the parties. All other depositions shall be limited to a maximum of 4 hours unless extended by agreement of the parties.
- h. Reports from retained experts under Rule 26(a)(2) due:

From Plaintiffs by June 1, 2006

From Defendants by July 1, 2006
- i. Supplementations pursuant to Rule 26(e) will be no later than 30 days prior to the end of the discovery period.

4. Other Items.

- a. The parties do not request a conference with the Court before entry of the Scheduling Order.
- b. The parties request a pretrial conference in September/October 2006.
- c. Plaintiffs should be allowed until March 1, 2006 to join additional parties and to amend the pleadings.
- d. Defendants should be allowed until April 1, 2006 to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed by August 1, 2006.

- f. The potential for settlement cannot be evaluated until additional discovery has been completed.
- g. Rule 26(a)(3) lists of trial witnesses and exhibits are due no later than 30 days prior to trial.
- h. Objections under Rule 26(a)(3) to trial witness and/or exhibit lists are due no later than 14 days from service.
- i. The case should be ready for trial on November 27, 2006, and it is expected that the trial will last no more than 3 days.

Respectfully submitted this the 22nd day of December, 2005.

/s/ M. Adam Jones (JON-126)
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